

### REMARKS

By this amendment, claims 6, 7, 11, 14-17, 19-20, 22 and 23 have been canceled. Claims 1, 8, 12, 18, 21 and 24 have been amended. Claims 1-5, 8-10, 12, 13, 18, 21 and 24 remain in the application. Support for the amendments to the claims can be found the specification and drawings. No new matter has been added. This application has been carefully considered in connection with the Examiner's Action. Reconsideration, withdrawal of the final action, and allowance of the application, as amended, is respectfully requested.

#### **Rejection under 35 U.S.C. §102**

Claim 1 recites: a reflective display apparatus comprising:

a first liquid crystal cell, said first liquid crystal cell comprising a plurality of first pixel elements configured to produce images, said first pixel elements being controllable between a non-reflective state, in which electromagnetic radiation having a first polarization is reflected to a first extent, and a reflective state, in which said electromagnetic radiation having a first polarization is reflected to a second extent, said second extent being greater than said first extent, wherein the first liquid crystal cell is further configured for reflecting electromagnetic radiation of the first polarization in the shape of a first image in a first direction; and

a second liquid crystal cell, said second liquid crystal cell comprising a plurality of second pixel elements configured to produce images, said second pixel elements being controllable between a non-reflective state, in which electromagnetic radiation having a second polarization is reflected to a third extent, and a reflective state, in which said electromagnetic radiation having a second polarization is reflected to a fourth extent, said fourth extent being greater than said third extent, wherein the second liquid crystal cell is further configured for reflecting electromagnetic radiation of the second polarization in the shape of

a second image in a second direction, the first image being different from the second image, and the first direction being different from the second direction, further characterized in that said first and second liquid crystal cells are configured so that said first polarization is different from said second polarization.

Claim 1 has been amended to include limitations of claims 11, 16 and 19, now canceled. Additional support for the amendments to claim 1 (including amendments to claim 18), can be found in the specification at least on page 7, lines 13-16; page 10, lines 9-15; page 13, lines 3-7 and 28-31; page 14, lines 7-19; and FIGs. 8 and 9.

Claims 1-24 were rejected under 35 U.S.C. §102(e) as being anticipated by Hiji et al. (US 6,580,482). With respect to claims 6, 7, 11, 14-17, 19-20, 22 and 23, the same have been canceled, thus rendering the rejection of the same now moot. With respect to claim 1, Applicant respectfully traverses this rejection for at least the following reasons.

The PTO provides in MPEP § 2131 that  
*"[t]o anticipate a claim, the reference must teach every element of the claim...."*

Therefore, with respect to claim 1, to sustain this rejection the Hiji reference must contain all of the above claimed elements of the respective claims. However, contrary to the examiner's position that all elements are disclosed in the Hiji reference, the latter reference does not disclose a "... *first liquid crystal cell* ... configured for reflecting ... radiation of the first polarization in the shape of a *first image* in a *first direction*; and a *second liquid crystal cell* ... configured for reflecting ... radiation of the second polarization in the shape of a *second image* in a *second direction*, the first image being *different* from the second image, and the first direction being *different* from the second direction ..." as is claimed in claim 1.

With respect to claim 18, to sustain this rejection the Hiji reference must contain all of the above claimed elements of the respective claims. However, contrary to the

examiner's position that all elements are disclosed in the Hiji reference, the latter reference does not disclose "... arranging the *first filter element* ... wherein the intended receiver of the first image *perceives only the first image*, and arranging the *second filter element* ... wherein the intended receiver of the second image *perceives only the second image*" as is claimed in claim 18.

*In contrast, the multi-color display device of Hiji teaches use of a "color filter 43" which transmits a red and absorbs a light of color other than red" (See Hiji, at column 11, lines 36-37) and the use of a "retardation layer 45, that changes the direction of a circularly polarized light in the reverse direction" (See Hiji, at column 13, line 14-15). However, Hiji does not teach or suggest a "... first liquid crystal cell ... configured for reflecting ... radiation of the first polarization in the shape of a first image in a first direction; and a second liquid crystal cell ... configured for reflecting ... radiation of the second polarization in the shape of a second image in a second direction, the first image being different from the second image, and the first direction being different from the second direction ..."* as is claimed in claim 1 of the present application. Furthermore, Hiji does not teach or suggest "... arranging the *first filter element* ... wherein the intended receiver of the first image *perceives only the first image*, and arranging the *second filter element* ... wherein the intended receiver of the second image *perceives only the second image*" as is claimed in claim 18 of the present application. Therefore, the rejection is not supported by the Hiji reference and should be withdrawn.

Accordingly, claim 1 is allowable and an early formal notice thereof is requested. Dependent claims 2-5, 8-10, 12, 13, 18, 21 and 24 depend from and further limit independent claim 1 and therefore are allowable as well. Accordingly, the 35 U.S.C. § 102(e) rejection thereof has now been overcome.

### **Conclusion**

Except as indicated herein, the claims were not amended in order to address issues of patentability and Applicants respectfully reserve all rights they may have under

the Doctrine of Equivalents. Applicants furthermore reserve their right to reintroduce subject matter deleted herein at a later time during the prosecution of this application or a continuation application.

It is clear from all of the foregoing that independent claim 1 is in condition for allowance. Dependent claims 2-5, 8-10, 12, 13, 18, 21 and 24 depend from and further limit independent claim 1 and therefore are allowable as well.

The amendments herein are fully supported by the original specification and drawings, therefore, no new matter is introduced. Withdrawal of the final action and issuance of an early formal notice of allowance of claims 1-5, 8-10, 12, 13, 18, 21 and 24 is requested.

Respectfully submitted,



Michael J. Balconi-Lamica  
Registration No. 34,291  
for Frank Keegan, Reg. No. 50,145

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Philips Intellectual Property & Standards  
345 Scarborough Road  
Briarcliff Manor, New York 10510  
Telephone: 914-333-9669  
Facsimile: 914-332-0615  
File: NL020620US

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